

2. The parties have previously stipulated to the requirements to be deemed certified to the subjects listed below and agree that there is no need to repeat those requirements again here.¹

3. In addition to meeting the requirements of the certificate titles sought, class members seeking permanent employment with Defendant must also complete three state-mandated workshops (child abuse identification/school violence prevention; harassment, bullying and discrimination prevention; and students with autism (for certain teaching titles)), which the parties agree the class member may complete after being deemed certified, but before commencing his or her classroom placement.

4. The parties agree that the following Plaintiffs shall, pursuant to the Injunction, be deemed by the Court to be certified by the State of New York to teach in the areas indicated below and shall be eligible to seek employment with Defendant. These Plaintiffs are:

- a. **Cynthia Harley (Claim No. 1014962).** Ms. Harley has completed the educational requirements and has the teaching experience needed to obtain provisional certificates in both Special Education and Pre-K to Grade 6, based on a transcript evaluation by Robert Bentley.² Ms. Harley has passed the ATS-W.³ She has, therefore, fulfilled all necessary requirements contemplated by paragraph 1.a. above.

¹ See Stipulation and Order dated March 4, 2015 [ECF No. 563], at ¶ 2 (elementary); Stipulation and Order dated June 8, 2015 [ECF No. 610], at ¶ 3 (Special Education); Stipulation and Order dated July 29, 2015 [ECF No. 654], at ¶¶ 4, 5 (special subjects [including Health and Physical Education] and TESOL).

² Attached as **Exhibit 1** is an email dated December 6, 2022 from Robert Bentley confirming that Ms. Harley has met the requirements for provisional certification.

³ Attached as **Exhibit 2** is a copy of Ms. Harley's TEACH account which confirmed that she passed the ATS-W October 18, 2008.

- b. **Naiomi Hendricks (Claim No. 4004072).** Ms. Hendricks has completed the educational requirements and has the teaching experience needed to obtain a provisional certificate in Pre-K to Grade 6, based on a transcript evaluation by Robert Bentley.⁴ Ms. Hendricks has passed the ATS-W.⁵ She has, therefore, fulfilled all necessary requirements contemplated by paragraph 1.a. above.
- c. **Aurelia Louis (Claim No. 1001383).** Ms. Louis was previously certified by the Court in Special Education through the 41st Stipulation.⁶ She has now completed the educational requirements and has the teaching experience needed to obtain a bilingual extension on her Special Education provisional certificate based on a transcript evaluation by Robert Bentley.⁷ Ms. Louis has passed the ATS-W.⁸ She has, therefore, fulfilled all necessary requirements contemplated by paragraph 1.a. above.
- d. **LaTonya Newton (Claim No. 1006470).** Ms. Newton has completed the educational requirements and has the teaching experience needed to obtain a provisional certificate in Special Education, based on a transcript evaluation by Robert Bentley.⁹ Ms. Newton has passed the ATS-W.¹⁰ She has, therefore, fulfilled all necessary requirements contemplated by paragraph 1.a. above.

⁴ Attached as **Exhibit 3** is an email dated January 9, 2023 from Robert Bentley confirming that Ms. Hendricks has met the requirements for provisional certification.

⁵ Attached as **Exhibit 4** is a copy of Ms. Hendricks' TEACH account which confirms that she passed the ATS-W on July 5, 2013.

⁶ See Stipulation and Order dated December 14, 2018 [ECF No. 1011], at ¶ 4(b).

⁷ Attached as **Exhibit 5** is an email dated September 10, 2022 from Robert Bentley confirming that Ms. Louis has met the requirements for a bilingual extension.

⁸ Attached as **Exhibit 6** is a copy of Ms. Louis's ATS-W score report, dated May 4, 2015.

⁹ Attached as **Exhibit 7** is an email dated November 13, 2022 from Robert Bentley confirming that Ms. Newton has met the requirements for provisional certification.

- e. **Peter Nunez (Claim No. 1003472).** Mr. Nunez has completed the educational requirements and has the teaching experience needed to obtain provisional certificates in both Pre-K to Grade 6 and TESOL, based on a transcript evaluation by Robert Bentley.¹¹ Mr. Nunez has passed the ATSW.¹² He has, therefore, fulfilled all necessary requirements contemplated by paragraph 1.a. above.
- f. **Claire Richardson (Claim No. 1009993).** Ms. Richardson has completed the educational requirements and has the teaching experience needed to obtain a provisional certificate in Health Education, based on a transcript evaluation by Robert Bentley.¹³ Ms. Richardson has passed the ATS-W.¹⁴ She has, therefore, fulfilled all necessary requirements contemplated by paragraph 1.a. above.
- g. **Pierre Seignon (Claim No. 1010036).** Mr. Seignon has completed the educational requirements and has the teaching experience needed to obtain a provisional certificate in Physical Education, based on a transcript evaluation by Robert Bentley.¹⁵ Mr. Seignon has passed the ATS-W.¹⁶ He has, therefore, fulfilled all necessary requirements contemplated by paragraph 1.a. above.

¹⁰ Attached as **Exhibit 8** is a copy of Ms. Newton's testing history which confirms that she passed the ATS-W on August 24, 2012.

¹¹ Attached as **Exhibit 9** is an email dated October 27, 2022 from Robert Bentley confirming that Mr. Nunez has met the requirements for provisional certification.

¹² Attached as **Exhibit 10** is a copy of Mr. Nunez's TEACH account which confirms that he passed the ATS-W on June 8, 1996.

¹³ Attached as **Exhibit 11** is an email dated December 22, 2022 from Robert Bentley confirming that Ms. Richardson has met the requirements for provisional certification.

¹⁴ Attached as **Exhibit 12** is a copy of Ms. Richardson's testing history which confirms that she passed the ATS-W on July 18, 1998.

¹⁵ Attached as **Exhibit 13** is an email dated December 3, 2022 from Robert Bentley confirming that Mr. Seignon has met the requirements for provisional certification.

¹⁶ Attached as **Exhibit 14** is a copy of Mr. Seignon's testing history which confirms that he passed the ATS-W on July 14, 2001.

5. The parties will submit by further stipulation additional Plaintiffs to be deemed certified as they are identified.

6. This Stipulation may be signed in counterparts and facsimile or e-mailed copies shall be deemed originals.

DATED: March 28, 2023



Joshua S. Sohn
Rachel Stevens
Stroock & Stroock & Lavan LLP
180 Maiden Lane
New York, New York 10038
Telephone: (212) 806-5400

Counsel for Plaintiffs



Andrea O'Connor
H. Keith Belfield
Office of the Corporation Counsel
City of New York
100 Church Street, Rm. 2-109h
New York, New York 10007
Telephone: (212) 356-1180

Counsel for Defendant

ON RECOMMENDATION OF THE SPECIAL MASTER

SO ORDERED.

Dated: April 10, 2023

/s/ Kimba M. Wood
KIMBA M. WOOD
United States District Judge